

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF CARPENTERS PENSION FUND, et al.,)	
)	
Plaintiffs,)	Case No. 08 C 1085
)	
)	Judge Amy J. St. Eve
v.)	
)	Magistrate Judge Mason
EXCEL INTERIOR CONSTRUCTION, INC.,)	
)	
Defendant.)	

SWORN DECLARATION PURSUANT TO 28 U.S.C.A. § 1746

Raymond J. Sanguinetti declares as follows:

1. I am an associate of the law firm of Whitfield & McGann and am licensed to practice law in the State of Illinois and in the U.S. Dist. Court for Northern District of Illinois, Eastern Division.
2. I have personal knowledge of the facts stated herein and if called to testify in this matter, I can competently testify to such facts from my own such knowledge.
3. I have in excess of 10 years experience representing trustees of employee benefit plans, including the prosecution of Federal Court litigation to compel compliance with the bonding provisions of the collective bargaining agreement and to collect delinquent employer contributions.
4. Defendant is obligated to pay the attorney fees and court costs incurred by the Plaintiffs pursuant to 29 U.S.C. §1132(g)(1).
5. I have devoted 7.85 hours in connection with this case at the rate of \$165.00 per hour. The total attorney fees billings is \$1,295.25. (See Attached Bill Slips)

6. In addition, the filing fee was \$350.00 and the fee for service of process was an additional \$55.00. These costs total \$405.00.

7. I certify that the attached detailed attorney fees and costs totaling \$1,700.25 were necessary and reasonable.

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in this Declaration is true and correct.

Date: April 30, 2008

s/ RAYMOND J. SANGUINETTI

Attorney for the Chicago Regional
Council of Carpenters Pension Fund, et
al.

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Slip Listing

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Selection Criteria

Case (hand select) Include: CBOND.N7546/23885
Slip Classification OpenRate Value and Slip Value hidden by Security Rights
Rate Info - identifies rate source and level

Slip ID		ATTORNEY	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Case	Est. Time	Bill Status	
Description		Reference	Variance		
349360	TIME	RJS	1.00		
11/8/2007		Billable	0.00	T@12	
Billed	G:72395	12/3/2007	CBOND.N7546/23885		
Review bond referral. Research Illinois Secretary of State records for corporate information. Prepared bond demand letter. Prepared updates on bond cases for Daniel McAnally and Robert Lid. Diary for suit.			0.00		
349570	TIME	RJS	1.75		
11/20/2007		Billable	0.00	T@12	
Billed	G:72395	12/3/2007	CBOND.N7546/23885		
Prepared Federal Civil suit for wage and fringe benefit bond; Prepared exhibits; Prepared Federal Summons; Prepared civil cover sheet and appearance; Letter to legal process server.			0.00		
349579	TIME	RJS	0.50		
11/21/2007		Billable	0.00	T@12	
Billed	G:72395	12/3/2007	CBOND.N7546/23885		
Prepared letter to Robert Lid regarding case status and filing of complaint.			0.00		
350511	TIME	CPW	0.25		
11/8/2007		Lexis	0.00		
Billed	G:72395	12/3/2007	CBOND.N7546/23885		
Computer Research Fees/CD ROM			0.00		
			0.00		
354306	TIME	RJS	0.25		
3/4/2008		Billable	0.00	T@12	
Billed	G:73139	4/2/2008	CBOND.N7546/23885		
Telephone conversation with Carla Sanchez regarding bond compliance. In process.			0.00		
354746	EXP	CPW	1	350.00	350.00
3/17/2008		\$DC			
Billed	G:73139	4/2/2008	CBOND.N7546/23885		
FILING FEE 2/21/08					

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Slip ID	Dates and Time	Posting Status	Description	ATTORNEY	Units	Rate	Slip Value
				Activity	DNB Time	Rate Info	
				Case	Est. Time	Bill Status	
				Reference	Variance		
354806	3/18/2008	Billed	Review report of legal process server Scott Forrest Stern & Associates, Inc. on service. Prepared for filing with federal court. Diary default appearance. Review minute order of Judge St. Eve setting status. Telephone conversation with Carla Sanchez, still in process with insurance agent.	RJS G:73139 CBOND.N7546/23885	0.25 0.00 0.00	T@12	
355323	3/31/2008	Billed	Confer with Raymond J. Sanguinetti regarding bond case and request to appear at court in his place.	DPL G:73139 CBOND.N7546/23885	0.25 0.00 0.00	T@12	
355541	4/1/2008	WIP	Prepare for court status/motion hearing; review file for current status; attend status hearing and schedule follow-up status hearing for April 30.	DPL CBOND.N7546/23885	1.00 0.00 0.00	T@12	
355582	4/1/2008	WIP	Telephone conversation with Carla Sanchez regarding status of the bond. Prepared letter to Sanchez confirming next status date and issue of attorney fees and costs.	RJS CBOND.N7546/23885	0.60 0.00 0.00	T@12	
357081	4/30/2008	WIP	Court Appearance	RJS CBOND.N7546/23885	1.00 0.00 0.00	T@12	
357090	4/30/2008	WIP	Prepared affidavit of Robert Lid in support of prove up. Prepared letter to Robert Lid regarding same.	RJS CBOND.N7546/23885	1.00 0.00 0.00	T@12	
357091	4/30/2008	WIP	Prepared motion for default judgment; Prepared notice of motion; Prepared certificate of service; Prepared exhibits;	RJS CBOND.N7546/23885	1.75 0.00 0.00	T@12	

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Slip ID	ATTORNEY	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Case	Est. Time	Bill Status	
Description	Reference	Variance		
Prepared affidavit of attorney fees; Prepared draft order.				

Grand Total

Billable	9.60
Unbillable	0.00
Total	9.60

-1.75

7.85 off 165.00

\$1295.25